

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA	:	
	:	
v.	:	1:13CR487-6
	:	
ELIZABETH ANN WOLFORD	:	Filed Under Seal

MOTION PURSUANT TO TITLE 18, UNITED STATES CODE, SECTION 3553(e)
AND SECTION 5K1.1 OF THE SENTENCING GUIDELINES

NOW COMES the United States of America, by and through Ripley Rand, United States Attorney for the Middle District of North Carolina, and hereby respectfully moves the Court, pursuant to U.S.S.G. § 5K1.1 and 18 U.S.C. § 3553(e), to reduce the sentence imposed in this matter due to substantial assistance provided to the United States in the investigation and prosecution of other persons, and states the following in support thereof:

1. Defendant Elizabeth Ann Wolford has pled guilty to one count of conspiracy to commit bank fraud, in violation of 18 U.S.C. § 1349. She currently awaits sentencing, scheduled to proceed on January 16, 2015 at 2:00 p.m. in Greensboro.

2. On or about March 2014, Defendant Wolford met with an agent with the United States Secret Service and the undersigned. At that time, she provided further information related to the conspiracy charged in the Superseding Indictment.

3. On or about June 2014, Defendant Welford and the United States entered into an agreement wherein the United States agreed to dismiss all charges against Defendant Welford but for Count One of the Superseding Indictment in exchange for Defendant Welford's truthful testimony in the related criminal matter.

4. On or about July 2014, Defendant Welford met with an agent with the United States Secret Service and the undersigned and provided further information related to the conspiracy charged in the Superseding Indictment in preparation for trial.

5. Soon thereafter and prior to the matter being called for trial, all four of Defendant Welford's remaining co-defendants entered pleas of guilty.

6. On or about December 2014, Defendant Welford was called by the United States to testify at the sentencing hearing for her co-defendant, Jermaine Lamont Jenkins, in support of a four-level leadership enhancement sought by the United States. In its findings of fact at that proceeding, the Court noted Defendant Welford's credibility as a witness.

7. The sentencing hearing of Defendant Welford's co-defendant Cedric Dewin Jenkins is scheduled to proceed on January 15, 2015. The United States intends to call Defendant Welford as a witness at that proceeding in support of a three-level leadership enhancement sought by the United States. The

United States anticipates that Defendant Wolford will provide truthful testimony at that time.

8. It is the position of the United States that Defendant Wolford has substantially assisted the United States in the prosecution of the above-captioned criminal matter.

9. WHEREFORE, the United States respectfully submits that Defendant Wolford's sentence be reduced twenty percent (20%) from that sentence within the applicable guideline range which this Court would otherwise have determined to be appropriate.

This, the 9th day of January, 2015.

Respectfully submitted,

RIPLEY RAND
United States Attorney

/S/ CLIFTON T. BARRETT
Assistant United States Attorney
Chief, Criminal Division

/S/JOANNA G. MCFADDEN
Assistant United States Attorney
NYSB # 4500948
United States Attorney's Office
Middle District of North Carolina
101 S. Edgeworth Street
Greensboro, NC 27401
Phone: 336/333-5351

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CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2015, the foregoing was electronically filed with the Clerk of the Court under seal using the CM/ECF system which will send notification of such filing to the following:

Helen Parsonage, Esq.

Respectfully submitted,

RIPLEY RAND
UNITED STATES ATTORNEY

/S/JOANNA G. MCFADDEN
Assistant United States Attorney
NYSB # 4500948
United States Attorney's Office
Middle District of North Carolina
101 S. Edgeworth Street
Greensboro, NC 27401
Phone: 336/333-5351